

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

RITA FOSTER,)
)
Plaintiff,)
)
vs.) **CASE NO.:2:07cv247 - MHT**
)
JOSEPH A. LEE,JAMES PARKER,)
LEON FRAZIER and ALABAMA)
STATE UNIVERSITY,)
)
Defendants.)

PLAINTIFF'S INITIAL DISCLOSURES

Comes now Plaintiff Rita Foster and submits the following disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

A. Individuals

1. Rita Foster
2. Joseph Lee
3. Leon Frazer
4. James Parker
5. Olan Wesley – Director Personal & Human Relations
6. Dr. Donna Toole
7. Renae Daniel
8. Elton Dean – Chairman of ASU Board of Trustees
9. Cynthia Anderson
10. Any person identified in the personnel file of Rita Foster.
11. Any member of the Board of Directors of Alabama State University.

B. Documents

1. All documents in the personnel file of Rita Foster.
2. All documents in the file of the Ethics Commission relating to James Parker.
3. All documents relating to any investigation of financial impropriety by James Parker while at Alabama State University.

C. Computation of Damages

1. Lost wages.
2. Medical Bills

/s/ Donald R. Jones, Jr.

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/s/ Thomas C. Tankersley

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CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Kenneth L. Thomas and Ramadanah M. Salaam-Jones, Thomas, Means, Gillis, & Seat, P.C., P.O. Drawer 5058, Montgomery, Alabama 36106; Solomon S. Seay, Jr., P.O. Box 210998, Montgomery, Alabama 36117; James H. Anderson, Beers, Anderson, Jackson, Hughes, & Patty, P.C., P.O. Box 1988, Montgomery, Alabama 36102.

/s/ Donald R. Jones, Jr.
Donald R. Jones, Jr.